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December 16, 2014

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Steve Barragan v. Rugfrit 1350 LLC, et al.*
Civil Action No. 14-CV-6927-RA

Dear Judge Abrams:

We represent the defendants in the above-referenced action and write with the consent of all parties to request an extension of time for defendants to answer or move in response to plaintiff's recently filed amended complaint. Pursuant to rule 4.C. of Your Honor's Individual Rules and Practices in Civil Cases, defendants' answer or motion is currently due on either December 29th or 30th (plaintiff originally filed his amended complaint yesterday but due to an ECF filing error was required to re-file today). Chiefly as a result of the time of year, in combination with an unusually busy period for counsel to defendants occurring at the same time, defendants request, and plaintiff has agreed, to extend our time to answer or move to Friday, January 9, 2015. This is the first such request.

Accordingly, defendants respectfully request the Court extend defendants' time to answer or move in response to the amended complaint to and including January 9, 2015. We thank the Court for its attention to this matter. Please do not hesitate to contact me for any reason.

Yours very truly,

Mark A. Beckman

cc: All Counsel of Record (*via* ECF only)